

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

INDECK KEYSTONE
ENERGY, LLC, a Delaware limited liability
company, :
Plaintiff, : CIVIL ACTION
v. : NO. 04-CV-325 (ERIE)
VICTORY ENERGY
OPERATIONS, LLC, a Delaware limited
liability company, :
Defendant. : Judge Sean J. McLaughlin

DISCOVERY DISPUTE CERTIFICATE

Undersigned Counsel hereby certifies that he has made good faith efforts to confer with opposing counsel and resolve the outstanding discovery disputes, but has been unable to reach a resolution. The efforts are outlined in detail in the attached Motion, but include numerous communications by phone and email and numerous offers at compromising the parties' respective positions.

Respectfully submitted,

/s/ Robert J. Williams
Robert J. Williams (Pa. ID. No. 76139)
SCHNADER HARRISON SEGAL & LEWIS LLP
Fifth Avenue Place
120 Fifth Avenue, Suite 2700
Pittsburgh, PA 15222-3001
Telephone: 412-577-5200
Facsimile: 412-765-3858

EXHIBIT